

PRC Environmental Management, Inc.  
233 North Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118



**PRC**

**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**HASCO SPRING INDUSTRIES, INC.  
(FORMERLY PARMCO-OHIO)  
JEFFERSON, OHIO  
OHD 004 172 276**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 004 172 276
Date Prepared	:	March 10, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH5S
Prepared by	:	PRC Environmental Management, Inc. (Peter Lynch)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

## TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
EXECUTIVE SUMMARY .....	ES-1
1.0 INTRODUCTION .....	1
2.0 FACILITY DESCRIPTION .....	4
2.1 FACILITY LOCATION .....	4
2.2 FACILITY OPERATIONS .....	4
2.3 WASTE GENERATION AND MANAGEMENT .....	7
2.4 HISTORY OF DOCUMENTED RELEASES .....	13
2.5 REGULATORY HISTORY .....	14
2.6 ENVIRONMENTAL SETTING .....	15
2.6.1 Climate .....	15
2.6.2 Flood Plain and Surface Water .....	16
2.6.3 Geology and Soils .....	16
2.6.4 Ground Water .....	17
2.7 RECEPTORS .....	17
3.0 SOLID WASTE MANAGEMENT UNITS .....	19
4.0 AREAS OF CONCERN .....	24
5.0 CONCLUSIONS AND RECOMMENDATIONS .....	25
REFERENCES .....	29

### Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

## LIST OF TABLES

<u>Table</u>		<u>Page</u>
1	SOLID WASTE MANAGEMENT UNITS .....	8
2	SOLID WASTES .....	10
3	SWMU SUMMARY .....	28

## LIST OF FIGURES

<u>Figure</u>		<u>Page</u>
1	FACILITY LOCATION .....	5
2	FACILITY LAYOUT .....	9

RELEASED 3/2/99  
DATE  
RIN # 634-99  
INITIALS WV

ENFORCEMENT  
CONFIDENTIAL

## EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Hasco Spring Industries, Inc. (Hasco), formerly Parmco-Ohio (Parmco), facility in Jefferson, Ashtabula County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Acme-Cleveland Corporation (Acme) built the original facility in 1967. From 1967 to 1983 the facility was operated by Namco Controls Corporation (Namco), a division of Acme. The facility was purchased by Parmco in 1983 and was operated by Hasco Industries, a subsidiary of Parmco. In 1992, the facility's name was changed to Hasco. Hasco has operated the facility at its current location since 1983. The facility occupies 5 acres in a mixed-use area and employs about 28 people. The facility is currently regulated as a large-quantity generator of hazardous waste. EPA approved closure for the facility's Electroplating Solution Treatment Area (SWMU 1) and a Container Storage Area (SWMU 2) in May 1983.

The Hasco facility manufactures counterbalance springs used in the automotive industry. Associated activities include tool and die, tow motor maintenance, and metal stamping operations. The facility generates and manages waste paint thinner (D001, F003, and F005); spent 1,1,1-trichloroethane (TCA) (F001 and F002); and waste 1,1,1-TCA still bottoms (F001 and F002). Nonhazardous waste streams generated at the facility include waste oil, waste antifreeze, waste paint filters, and general refuse.

From 1967 to 1983, the Namco facility generated waste cyanide solids (F015), waste cyanide solution (F015), waste caustic solution (D002), waste hydrochloric acid solution (D002), waste sodium hydroxide solids (D002), waste chrome solution (D007), waste flammable liquids (D001), waste trichloroethene (F001 and F002), nonhazardous waste coolant, nonhazardous waste hydraulic oils, and nonhazardous waste epoxy resin dust. EPA delisted the waste cyanide solids (F015) and waste cyanide solution (F015) in the early 1980s.

The PA/VSI identified the following five SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Former Electroplating Solution Treatment Area
2. Former Container Storage Area
3. Chemical Storage Area
4. Vapor Degreaser Area
5. Refuse Dumpster

RELEASED  
DATE 3/2/99  
RIN # 039-99  
INITIALS mv

The potential for a release of hazardous constituents to ground water, surface water, air, and on-site soils is low. EPA approved closure of the Former Electroplating Solution Treatment Area (SWMU 1) and the Former Container Storage Area (SWMU 2) on May 18, 1983. During the VSI, PRC noted no evidence of release from these units, which have been inactive since 1983. The Chemical Storage Area (SWMU 3) and the Vapor Degreaser Area (SWMU 4) are located indoors, and waste containing volatile organic compounds (VOC) is managed in closed containers or enclosed systems. Releases from SWMUs 3 and 4 would not be likely to leave the enclosed areas. The Refuse Dumpster (SWMU 5) is located outdoors and manages nonhazardous waste paint filters and general refuse. These materials are solid and would not be likely to migrate from the unit. In addition, level topography at the facility would be expected to inhibit contaminant migration to surface water. A release of one gallon of 1,1,1-TCA in October 1990, at SWMU 4 entered the sewer system. The facility has since installed a pipe around the drain to prevent further releases from entering the sewer line.

PRC recommends that the waste paint filters currently managed in the Refuse Dumpster (SWMU 5) be characterized to determine if they contain hazardous constituents; the analytical results should be submitted to the Ohio Environmental Protection Agency for review and the waste managed accordingly and properly disposed of. PRC recommends that no further action be taken at this time for the Former Electroplating Solution Treatment Area (SWMU 1), the Former Container Storage Area (SWMU 2), the Chemical Storage Area (SWMU 3), and the Vapor Degreaser Area (SWMU 4).

## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Hasco Spring Industries, Inc. (Hasco), facility (EPA Identification No. OHD 004 172 276) in Jefferson, Ashtabula County, Ohio. The PA was completed on November 23, 1992. PRC gathered and reviewed information from the Federal Emergency Management Agency (FEMA), the U.S. Department of Agriculture (USDA), the U.S. Department of Commerce (USDC), the United States Geological Survey (USGS), the Ohio Environmental Protection Agency (OEPA), and from EPA Region 5 RCRA files. The VSI was conducted on December 7, 1992. It included interviews with facility representatives and

a walk-through inspection of the facility. PRC identified five SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and seven inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

### **2.1 FACILITY LOCATION**

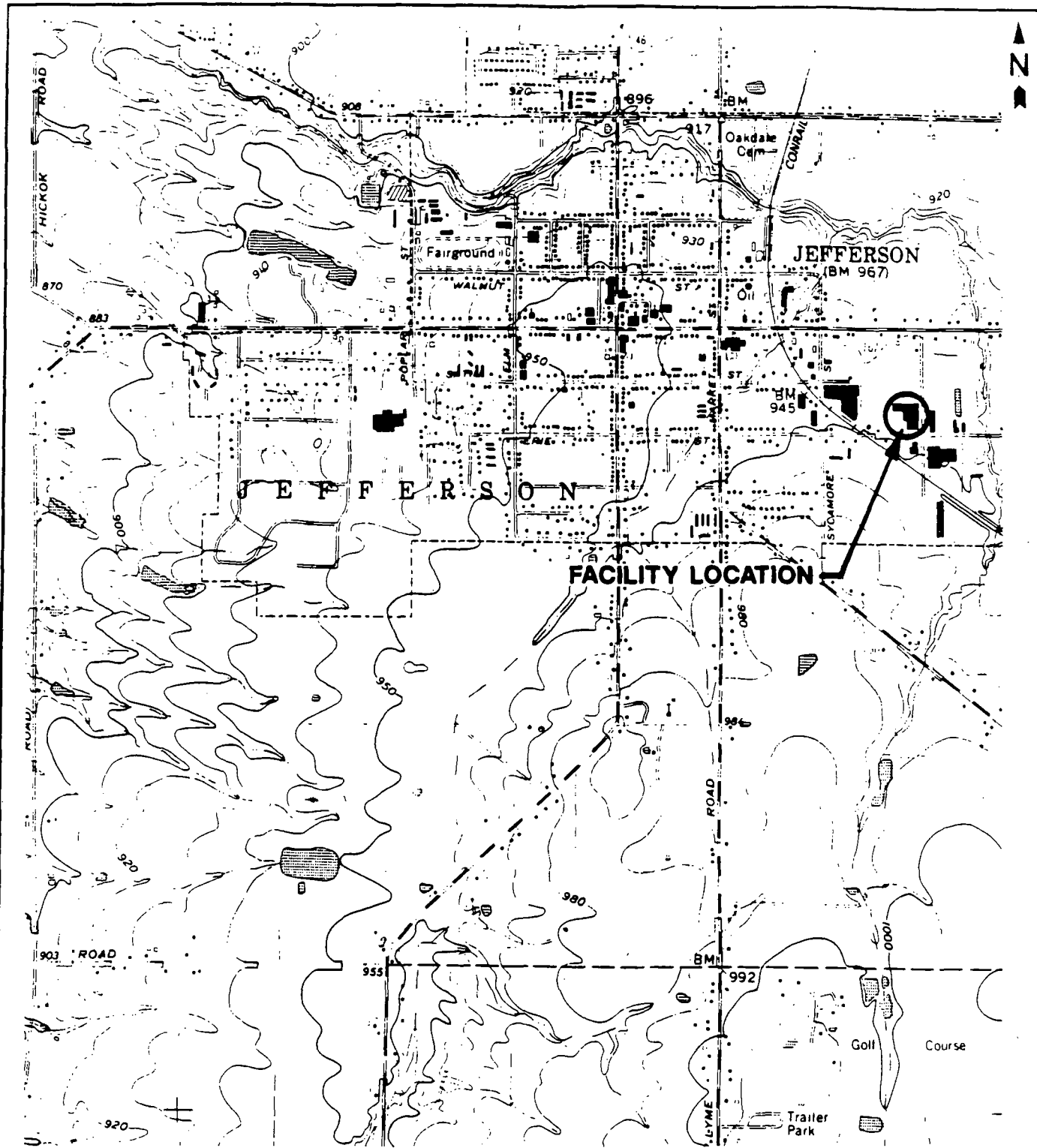
The Hasco facility is located at 149 Cucumber Street in Jefferson, Ashtabula County, Ohio. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°44'00"N and longitude 80°46'00"W). The facility occupies 5 acres in a mixed-use area. The facility is bordered on the north by a residential area, on the west by Stone Container Corporation, on the south by Quick Plastics, and on the east by Jefferson Manufacturing.

### **2.2 FACILITY OPERATIONS**

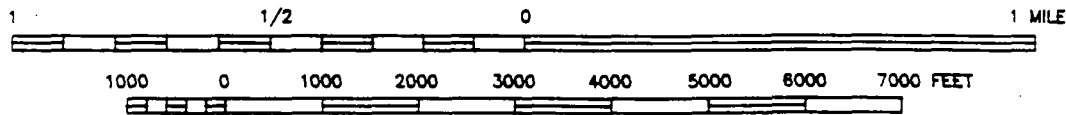
Hasco has operated the facility since 1983 and employs about 28 people. The facility consists of a 74,000-square-foot manufacturing building, a sandblasting area, a product and equipment storage area, and parking areas. A paint area and a chemical storage area occupy the west end of the manufacturing building, and product and equipment storage area are located in the northwest corner. A product quality control area is located in the north end of the manufacturing building. A tool room, metal stamping area, vehicle maintenance area, fabrication area, and coiler department occupy the central portion of the manufacturing building. Shipping and receiving docks are located at the east side of the manufacturing building, and offices are located in the southeast corner. The sandblasting area (Former Container Storage Area [SWMU 2]) and an equipment storage area are located west of the manufacturing building, and parking areas are located to the east.

The Hasco facility manufactures counterbalance springs used in the automotive industry. As part of this operation, sheet metal is cut to size in a metal stamping operation. Stamped metal is then machined and shaped into counterbalance springs. The facility also manufactures small machine parts in a tool and die operation and performs routine maintenance painting.

HASCOI.DWG - 02/16/93 - MJB 006-C050870455



SCALE 1:24000



SCALE: 1" = 2,000'



QUADRANGLE LOCATION

HASCO SPRING INDUSTRIES, INC.  
(FORMERLY PARMCO-OHIO)  
JEFFERSON, OHIO

FIGURE 1

FACILITY LOCATION

**PMC** ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM USGS,  
JEFFERSON, OHIO QUADRANGLE, 1985

The following products are delivered to the facility for use in manufacturing and maintenance operations: paint; paint thinner; oil and antifreeze; 1,1,1-trichloroethane; and sheet metal. Paint used in routine maintenance painting is delivered to the facility in 5-gallon buckets and is stored in the Chemical Storage Area (SWMU 3). Paint thinner is used to clean spray-paint guns and lines as well as small parts. Paint thinner is delivered to the facility in 55-gallon drums and is stored in the Chemical Storage Area (SWMU 3). Oil and antifreeze used in tow motor maintenance activities is delivered to the facility in 55-gallon drums and is stored in the Chemical Storage Area (SWMU 3). 1,1,1-trichloroethane (1,1,1-TCA) used in routine machine and tow motor maintenance is delivered to the facility in 55-gallon drums and is stored outdoors on a concrete pad west of the manufacturing building. Reclaimed 1,1,1-TCA is reused in the facility in tow motor maintenance operations. Sheet metal is stored in the storage area in the northwest corner of the manufacturing building.

In 1967, the Acme-Cleveland Corporation built the facility on previously undeveloped land and began electroplating electrical coils. From 1967 to 1983, Namco Controls Corporation (Namco) operated the facility as a division of the Acme-Cleveland Corporation (Acme). Electrical coils were zinc plated in an electroplating solution. Troughs underneath two plating lines directed released electroplating solution to two below-grade concrete tanks located in the north end of the manufacturing building for treatment. Off-specification electrical coils were routinely ground into fine particulate matter. Dust containing epoxy resin was directed to a baghouse system, where it was collected in a 55-gallon drum. Full drums were stored in the Former Container Storage Area (SWMU 2) located west of the manufacturing building; this area is currently used for sandblasting.

In 1983, the facility was purchased by Parmco-Ohio and began manufacturing counterbalance springs. From 1983 to 1992, the facility was operated by Hasco, a subsidiary of Parmco-Ohio. In 1992, the facility's name was changed to Hasco. Prior to 1967, the land was undeveloped.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

## 2.3

### WASTE GENERATION AND MANAGEMENT

This section describes waste generation and management at the Hasco facility. Facility SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. Facility waste streams are summarized in Table 2.

The Hasco facility currently generates three hazardous and four nonhazardous waste streams. Hazardous waste streams generated at the facility include waste paint thinner (D001, F003, and F005); spent 1,1,1-TCA (F001 and F002); and waste 1,1,1-TCA still bottoms (F001 and F002). Nonhazardous waste streams generated at the facility include waste oil, waste antifreeze, waste paint filters, and general refuse. From 1967 to 1983, the Namco facility generated waste cyanide solids (F015), waste cyanide solution (F015), waste caustic solution (D002), waste hydrochloric acid solution (D002), waste sodium hydroxide solids (D002), waste chrome solution (D002 and D007), waste flammable liquids (D001), waste trichloroethene (F001 and F002), waste coolant, waste hydraulic oils, and waste epoxy resin dust. EPA delisted waste cyanide solids and waste cyanide solution (F015) in the early 1980s.

Wastes are generated and managed at various locations at the facility. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

Counterbalance springs are painted in a paint area on the west side of the manufacturing building. Routine maintenance painting also occurs in this area. Paint thinner is used in a closed-loop system to clean spray-paint guns and lines and small miscellaneous parts. When the paint thinner becomes unusable, it is transferred in 5-gallon containers to the Chemical Storage Area (SWMU 3), where it is stored for less than 90 days. Hasco was unable to provide PRC information regarding generation rates and final disposition for waste paint thinner (D001, F003, and F005).

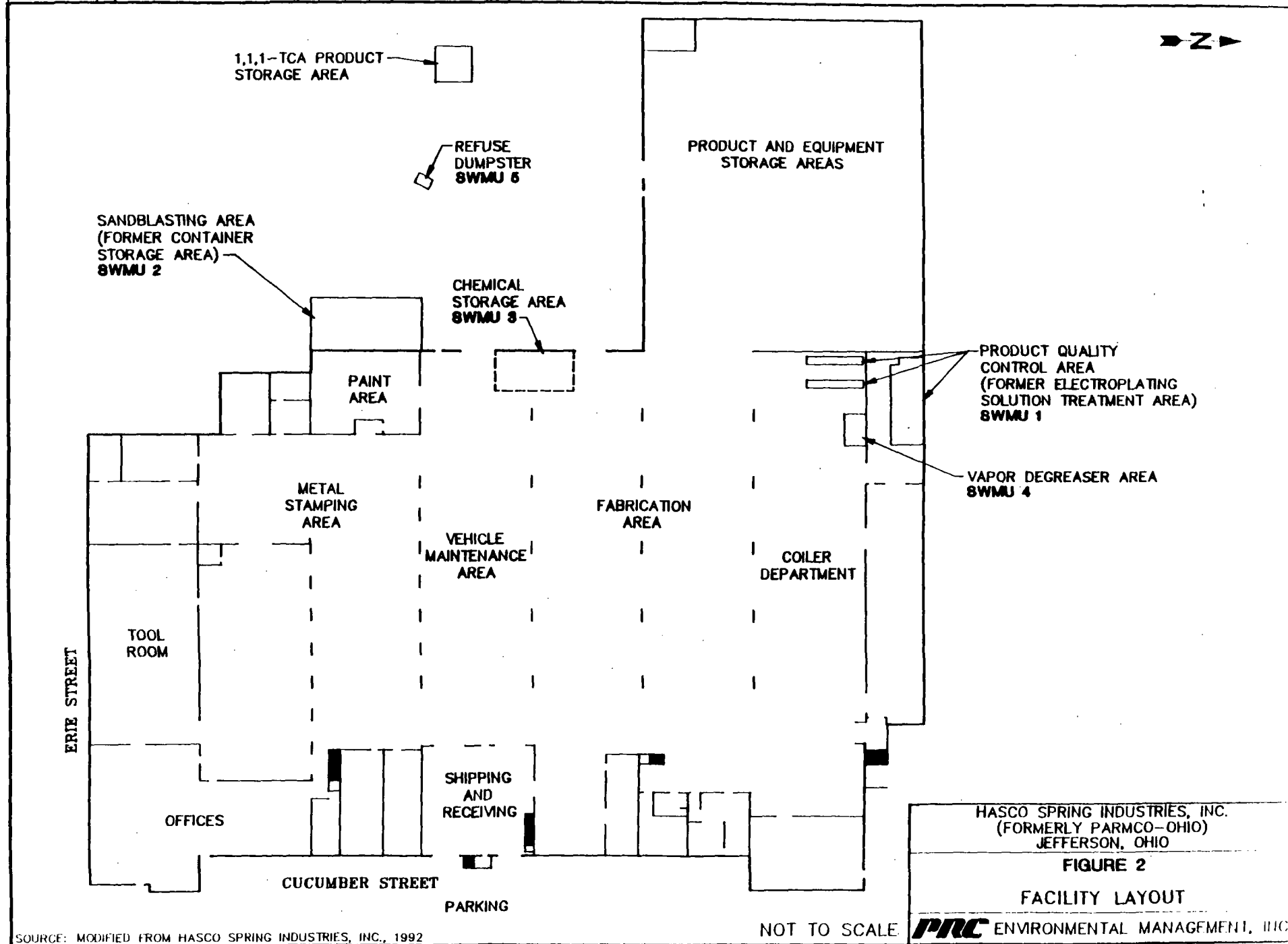
Tow motor maintenance occurs in the vehicle maintenance area, located in the central portion of the manufacturing building. Small vehicle parts are cleaned in a parts cleaner consisting of a pan that drains into a 35-gallon drum. The facility uses 1,1,1-TCA to clean small tow motor parts. Spent 1,1,1-TCA (F001 and F002) is processed in the Vapor Degreaser Area (SWMU 4), located on the north side of the manufacturing building. 1,1,1-TCA still bottoms (F001 and F002) are separated from the spent 1,1,1-TCA in a distillation unit. Reclaimed 1,1,1-TCA is reused in the facility in tow motor maintenance operations. The still bottoms are stored in covered 55-gallon drums in the Chemical Storage Area (SWMU 3) for less than 90 days.

**TABLE 1**  
**SOLID WASTE MANAGEMENT UNITS**

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit<sup>a</sup></u>	<u>Status</u>
1	Former Electroplating Solution Treatment Area	Yes	Inactive; approved RCRA closure in 1983
2	Former Container Storage Area	Yes	Inactive; approved RCRA closure in 1983
3	Chemical Storage Area	No	Active; less than 90-day storage of hazardous waste
4	Vapor Degreaser Area	No	Active; reclamation of spent 1,1,1-TCA
5	Refuse Dumpster	No	Active; storage of nonhazardous waste

Note:

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



HASCO SPRING INDUSTRIES, INC.  
(FORMERLY PARMCO-OHIO)  
JEFFERSON, OHIO

**FIGURE 2**

**FACILITY LAYOUT**

**PRC** ENVIRONMENTAL MANAGEMENT, INC.

**TABLE 2**  
**SOLID WASTES**

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Waste paint thinner / D001, F003, and F005	Painting operations	SWMU 3
Spent 1,1,1-TCA / F001 and F002	Parts cleaning operations	SWMU 4
Waste 1,1,1-TCA still bottoms / F001 and F002	Distillation	SWMU 3
Waste oil / NA <sup>a</sup>	Tow motor and machine maintenance operations	SWMU 3
Waste antifreeze / NA <sup>a</sup>	Tow motor maintenance operations	SWMU 3
Waste paint filters / NA <sup>a,c</sup>	Painting operations	SWMU 5
General refuse / NA <sup>a</sup>	Routine facility operations	SWMU 5
Waste cyanide solids / F015 <sup>b</sup>	Electroplating operations	SWMU 2
Waste cyanide solution / F015 <sup>b</sup>	Electroplating operations	SWMUs 1 and 2
Waste caustic solution / D002 <sup>b</sup>	Electroplating operations	SWMU 1
Waste hydrochloric acid solution / D002 <sup>b</sup>	Electroplating operations	SWMU 1
Waste sodium hydroxide solids / D002 <sup>b</sup>	Electroplating operations	SWMU 2
Waste chrome solution / D002 and D007 <sup>b</sup>	Electroplating operations	SWMU 1
Waste flammable liquids / D001 <sup>b</sup>	Unknown	SWMU 2

**TABLE 2 (Continued)**  
**SOLID WASTES**

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Waste trichloroethene / F001 and F002 <sup>b</sup>	Unknown	SWMU 2
Waste coolant / NA <sup>b</sup>	Routine equipment maintenance	SWMU 2
Waste hydraulic oils / NA <sup>b</sup>	Routine equipment maintenance	SWMU 2
Waste epoxy resin dust / NA <sup>b</sup>	Electrical coil grinding	SWMU 2

Notes:

- <sup>a</sup> Not applicable (NA) designates a nonhazardous waste.
- <sup>b</sup> Not currently generated
- <sup>c</sup> The Hasco facility considers this material to be nonhazardous; however, the facility was unable to provide PRC with waste analysis showing the waste paint filters to be nonhazardous.

prior to shipment. Still bottoms are manifested and transported off site by Safety-Kleen Corporation (Safety-Kleen). Hasco was unable to provide PRC with information regarding generation rates and final disposition of waste 1,1,1-TCA still bottoms.

Oil is periodically drained from facility tow motors and machines in the vehicle maintenance area. Waste oil is collected in 1-gallon containers and immediately transferred to a covered 55-gallon drum located in the Chemical Storage Area (SWMU 3). Hasco was unable to provide PRC with information regarding generation rates and final disposition of waste oil.

Antifreeze is used in facility tow motors and is periodically drained during routine maintenance activities in the vehicle maintenance area. Waste antifreeze is collected in 1-gallon containers and immediately transferred to a covered 55-gallon drum located in the Chemical Storage Area (SWMU 3). Hasco was unable to provide PRC with information regarding generation rates and final disposition of waste antifreeze.

Paint filters are periodically removed from the spray paint booth in the paint area. Hasco considers waste paint filters to be nonhazardous waste; however, the facility was unable to provide PRC with analysis showing waste paint filters to be nonhazardous. Waste paint filters are disposed of in the Refuse Dumpster (SWMU 5) along with general refuse generated during routine facility operations. The dumpster is located outdoors in the miscellaneous equipment storage area west of the main building. Hasco was unable to provide PRC with information regarding generation rates and final disposition of waste paint filters.

From 1967 to 1983, the Namco facility electroplated electrical coils. Two electroplating lines were located in the north side of the manufacturing building. Electric coils were electroplated in a chrome- or cyanide-bearing solution. Routinely spilled electroplating solution was collected in two 1-foot-high by 30-foot-long by 6- to 8-inch-deep concrete trenches. The trenches made up the Former Electroplating Solution Treatment Area (SWMU 1) and were located underneath the electroplating lines. The trenches were sloped, and waste electroplating solution was directed to two concrete tanks for treatment. The tanks are also considered part of SWMU 1. Waste cyanide solids (F015) and waste cyanide solution (F015) were generated during electroplating and electroplating solution treatment operations. Waste cyanide solids and waste cyanide solution were managed in the Former Container Storage Area (SWMU 2). This area consists of a 20- by 50-foot concrete pad located outdoors adjacent to the west wall of the manufacturing building. Waste caustic solution (D002), waste hydrochloric acid solution (D002),

waste sodium hydroxide solids (D002), and waste chrome solution (D002 and D007) were also generated during electroplating and electroplating solution treatment operations. Waste sodium hydroxide solids were managed in the Former Container Storage Area (SWMU 2). During a review of EPA and OEPA files and during the VSI, PRC was unable to determine generation rates and final disposition for these materials.

From 1967 to 1983, waste flammable liquids (D001) and waste trichloroethene (F001 and F002) were also generated; however, PRC was unable to identify facility processes that generated these materials. Waste flammable liquids and waste trichloroethene were stored in the Former Container Storage Area (SWMU 2) prior to shipment off site. PRC was also unable to determine generation rates and final disposition for these materials.

From 1967 to 1983, nonhazardous waste coolant and nonhazardous waste hydraulic oils were generated during routine maintenance operations. Nonhazardous waste coolant and nonhazardous waste hydraulic oils were stored in 55-gallon drums in the Former Container Storage Area (SWMU 2) prior to off-site shipment. PRC was unable to determine generation rates and final disposition for these materials.

From 1967 to 1983, off-specification electrical coils containing epoxy resin were routinely pulverized. Nonhazardous waste epoxy resin dust was directed to a dust collector consisting of a baghouse and a 55-gallon drum. Full 55-gallon drums of the dust were transferred to the Former Container Storage Area (SWMU 2) for storage prior to off-site shipment. During a review of EPA and OEPA files and during the VSI, PRC was unable to determine the location of the baghouse collector. PRC was also unable to determine the generation rates and final disposition for the nonhazardous waste epoxy resin dust.

## **2.4 HISTORY OF DOCUMENTED RELEASES**

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

In October 1990, about 1 gallon of 1,1,1-TCA was released from the Vapor Degreaser Area (SWMU 4). The release was directed to the sewer line drain located in the center of the concrete pit under the vapor degreaser. The sewer line discharges to the Jefferson wastewater

treatment plant (WWTP). The facility has since installed a pipe around the drain to prevent further releases from entering the sewer line.

## 2.5 REGULATORY HISTORY

On July 28, 1980, Namco submitted a Notification of Hazardous Waste Activity form to EPA as a generator and as a treatment, storage, or disposal (TSD) facility (Namco, 1980a). Namco submitted a RCRA Part A permit application on November 11, 1980 (Namco, 1980b). The application listed process codes for container storage (S01) of F001 wastes and treatment (T01) of F006, F007, and F009 wastes. These process codes referred to the Former Container Storage Area (SWMU 2) and the Former Electroplating Solution Treatment Area (SWMU 1), respectively. On May 4, 1982, EPA stated that the Namco facility met the requirements of Section 3005(e) of RCRA for Interim Status (EPA, 1982a).

On March 22, 1982, Namco submitted a closure plan for the Former Electroplating Solution Treatment Area (SWMU 1) and the Former Container Storage Area (SWMU 2) (Namco, 1982). EPA approved Namco's closure plan on June 15, 1982 (EPA, 1982b). In a letter dated February 11, 1983, Namco stated that all closure activities had been completed (Namco, 1983a). Closure activities included off-site disposal of waste hydrochloric acid solution, waste chrome solution, waste trichloroethylene, waste coolant, and waste hydraulic oils that had been stored for more than 90 days. On April 22, 1983, Namco submitted a certification of completion for the closure of the Former Electroplating Solution Treatment Area (SWMU 1) and the Former Container Storage Area (SWMU 2) (Namco, 1983b). On May 18, 1983, EPA approved closure of SWMUs 1 and 2 (EPA, 1983).

On August 3, 1989, Parmco submitted a revised Notification of Hazardous Waste Activity (Parmco, 1989). This application listed generation of D001, F003, and F005 wastes. The Hasco facility is currently regulated as a large-quantity generator storing hazardous waste for less than 90 days.

During a review of EPA, OEPA, and facility files, PRC found no documentation of previous compliance inspections at the Hasco facility.

The Hasco facility currently operates two units requiring air permits: (1) a spray paint booth used to conduct routine maintenance painting operations and (2) sandblasting operations

conducted as part of parts cleaning operations. In a letter dated October 10, 1990, OEPA stated that the installation of the spray paint booth and the sandblasting operations required a Permit to Install and a Permit to Operate. OEPA requested that the Parmco facility submit a completed OEPA Appendix D form for the spray paint booth and a completed OEPA Appendix M23 form for the sandblasting operations (OEPA, 1990). During a review of EPA and OEPA files, PRC was unable to locate completed OEPA Appendix D or OEPA Appendix M23 forms. PRC was also unable to locate air permits indicating permit numbers for the spray paint booth and the sandblasting operations. The facility has no history of odor complaints from area residents.

The Hasco facility is not required to have a National Pollutant Discharge Elimination System Permit. Sanitary wastewater, surface runoff, and noncontact cooling water discharge to the Jefferson WWTP.

The Hasco facility has not had any underground storage tanks, and there is no history of CERCLA activity at the facility.

## **2.6 ENVIRONMENTAL SETTING**

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

### **2.6.1 Climate**

The climate in Ashtabula County is continental. The average daily temperature is 49 degrees Fahrenheit (°F). The lowest average daily temperature is 14 °F in January. The highest average daily temperature is 81 °F in July (USDA, 1973).

The total annual precipitation for the county is about 37 inches. The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is about 4 inches.

The prevailing wind is from the north. Average wind speed is 13 miles per hour (USDA, 1973).

### **2.6.2 Flood Plain and Surface Water**

The Hasco facility is located in a zone of minimal flood hazards (FEMA, 1979).

The nearest surface water body consists of an unnamed drainage ditch located about 1,000 feet east of the facility. This unnamed drainage discharges into Mill Creek, which is located about 3 miles west of the facility at its nearest point. Mill Creek discharges into the Grand River, which is located about 6 miles west of the facility at its nearest point. These surface water bodies are used for drainage purposes.

The ground surface at the Hasco facility is level. Surface water runoff is directed to storm sewers that drain into the Jefferson WWTP.

### **2.6.3 Geology and Soils**

Facility-specific geology and soils information was unavailable for review. Regional geology and soils information is presented below.

Ashtabula County is located in northeast Ohio. The county is characterized by Wisconsinian-Age unconsolidated glacial deposits underlain by sedimentary Devonian and Mississippian-Age bedrock. Glacial deposits in the area consist of sand, silt, gravel, and clay.

The topography of the area is characterized by the relatively level Lake Plain of the Central Lowland Province in the northern part of the county and the glacial end moraines present in the Appalachian Plateau Province in the southern part of the county, including the Hasco facility. Surficial deposits in Ashtabula County are predominantly composed of unconsolidated glacial end moraines and lake and till plains at a low elevation. Glacial and moraine deposits typically consist of an unsorted, unstratified mixture of sediments of various sizes, but primarily contain fine-grained sediments. Lake and till plain deposits typically consist of silts and fine sands underlain by dense clayey silts. Surficial deposits in Ashtabula County are about 50 feet thick. Bedrock in the area consists of the Devonian-Age Cleveland Member of the Ohio Formation. The Ohio Formation consists of a black carbonaceous shale [Woodward-Clyde Consultants (WCC), 1986].

Surface soils in the vicinity of the facility generally consist of poorly drained dark gray to brown silty loam (USDA, 1973).

#### **2.6.4 Ground Water**

No facility-specific ground-water information is available. The following paragraphs discuss the regional ground-water setting of Ashtabula County.

Ground-water wells developed in the unconsolidated deposits yield very little ground water, usually less than 5 gallons per minute (gpm). Because of the low permeability of the unconsolidated deposits, wells are generally pumped dry quickly and take a considerable amount of time to fully recover. Wells developed in the upper, weathered portion of the shales typically yield less than 3 gpm. Below the upper, weathered portions of the shales, very minimal supplies are available (WCC, 1986).

The Hasco facility has no on-site industrial ground-water wells. Ground water is generally considered an unavailable and unimportant source of water in this region. Ashtabula County obtains its water supplies from Lake Erie. Ground water flows in the same direction as surface water, generally in an easterly direction towards the Ashtabula River, which flows northwest and eventually empties into Lake Erie (WCC, 1986).

#### **2.7 RECEPTORS**

The facility occupies 5 acres in a mixed-use area in Jefferson, Ohio. Jefferson has a population of about 3,331.

The facility is bordered on the north by a residential area, on the west by Stone Container Corporation, on the south by Quick Plastics, and on the east by Jefferson Manufacturing. The nearest school is located about 0.5 mile northwest of the facility. The nearest residence is located about 800 feet north of the facility. Access to the facility is limited by a fence surrounding the western exterior portions of the property and 24-hour electronic security.

The nearest surface water body consists of an unnamed drainage ditch located about 1,000 feet east of the facility. The unnamed drainage is used for drainage purposes only. Other surface

water bodies in the area include Mill Creek and the Grand River, located about 3 and 6 miles west of the facility, respectively. These bodies are also used for drainage purposes.

Ground water is not used as an industrial or municipal water supply.

Sensitive environments are not located on site. The nearest sensitive environment is a wetland area located about 2 miles southwest of the facility.

### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

#### **SWMU 1**

#### **Former Electroplating Solution Treatment Area**

##### **Unit Description:**

This unit consists of two 1-foot-wide by 30-foot-long by 6- to 8-inch-deep concrete trenches and two below-grade concrete tanks. Routinely spilled electroplating solution was collected in the two trenches, which were located underneath electroplating lines. The spilled solution was then directed towards the two below-grade concrete tanks for treatment. This unit was located in the north end of the manufacturing building. In 1983, the Namco facility filled the two trenches and the two below-grade concrete tanks with concrete. The location of this unit is currently used for quality control testing of counterbalance springs.

##### **Date of Startup:**

This unit began operation in about 1967.

##### **Date of Closure:**

This unit underwent RCRA closure in 1983. EPA approved closure of this unit on May 18, 1983.

##### **Wastes Managed:**

This unit managed waste cyanide solution (F015), waste caustic solution (D002), waste hydrochloric acid solution (D002), and waste chrome solution (D002 and D007).

##### **Release Controls:**

During a review of EPA and OEPA files, PRC was unable to determine if release controls were present at this unit. During the VSI, Namco and Acme representatives were unable to provide any information concerning release controls at this unit.

**History of  
Documented Releases:**

No releases from this unit have been documented.

**Observations:**

During the VSI, PRC observed that the two trenches and two concrete tanks had been filled with concrete. The location of this unit is currently used for quality control testing of counterbalance springs. PRC noted no evidence of release (see Photographs No. 1 and 2).

**SWMU 2**

**Former Container Storage Area**

**Unit Description:**

This unit consists of a 20-foot by 50-foot concrete pad located adjacent to the west wall of the manufacturing building. From 1967 to 1983, this unit was used to store hazardous and nonhazardous waste. From 1983 to the present, this unit has been used for sandblasting operations. From 1967 to 1983, the unit was covered only by a corrugated metal roof. The unit is currently completely enclosed.

**Date of Startup:**

This unit began operating in 1967.

**Date of Closure:**

This unit underwent RCRA closure in 1983. EPA approved closure of this unit on May 18, 1983.

**Wastes Managed:**

From 1967 to 1983, this unit managed waste cyanide solids (F015), waste cyanide solution (F015), waste sodium hydroxide solids (D002), waste flammable liquids (D001), waste trichloroethene (F001 and F002), nonhazardous waste coolant, nonhazardous waste hydraulic oils, and nonhazardous waste epoxy resin dust.

**Release Controls:**

This unit consisted of a covered concrete pad with no secondary containment.

**History of  
Documented Releases:**

No releases from this unit have been documented.

**Observations:** During the VSI, the unit contained sandblasting equipment and packaged sandblasting grit. This unit also contained loose sandblasting grit on the concrete pad. Due to large amounts of sandblasting grit on the pad, PRC was unable to note any evidence of release (see Photographs No. 3 and 4).

**SWMU 3                      Chemical Storage Area**

**Unit Description:** This unit consists of a 20-foot by 30-foot concrete pad located indoors on the west side of the manufacturing building. This unit is used to store hazardous and nonhazardous waste for less than 90 days prior to off-site shipment. Miscellaneous equipment and paint, paint thinner, oil, and antifreeze are stored in this unit until they are used in facility operations.

**Date of Startup:** This unit began operation in 1983.

**Date of Closure:** This unit is active.

**Wastes Managed:** This unit manages waste paint thinner (D001, F003, and F005); waste 1,1,1-TCA still bottoms (F001 and F002); nonhazardous waste oil, and nonhazardous waste antifreeze.

**Release Controls:** Hazardous and nonhazardous waste is stored in covered containers located indoors on a concrete pad.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** During the VSI, the unit contained two full 55-gallon drums of hazardous waste 1,1,1-TCA still bottoms; one full drum of nonhazardous waste oil; and one full drum of nonhazardous waste antifreeze. PRC noted oil staining and absorbent spill cleanup material in the south end of this unit (see Photograph No. 5).

**SWMU 4****Vapor Degreaser Area****Unit Description:**

This unit consists of a vapor degreaser and a distillation unit. A 15-foot-long by 8-foot-wide by 3-foot-deep concrete pit lies below the vapor degreaser. The still is used to reclaim spent 1,1,1-TCA generated in the vapor degreaser. Waste 1,1,1-TCA still bottoms (F001 and F002) generated in the still are placed in a covered 55-gallon drum located in the Chemical Storage Area (SWMU 3) prior to off-site shipment. Reclaimed 1,1,1-TCA is reused in the facility in tow motor maintenance operations.

**Date of Startup:**

This unit began operation in 1983.

**Date of Closure:**

This unit is active.

**Wastes Managed:**

This unit manages spent 1,1,1-TCA (F001 and F002) and generates waste 1,1,1-TCA still bottoms (F001 and F002).

**Release Controls:**

Secondary containment at this unit consists of a 15-foot-long by 8-foot-wide by 3-foot-deep concrete pit located directly underneath the vapor degreaser unit. A drain inside the concrete pit is surrounded by a pipe to prevent releases from entering the drain. The drain leads to a sewer line that discharges to the Jefferson WWTP.

**History of  
Documented Releases:**

In October, 1990, about 1 gallon of 1,1,1-TCA was released from the Vapor Degreaser Area. The release was directed to the sewer line drain located in the center of the concrete pit under the vapor degreaser unit. The sewer line discharges to the Jefferson WWTP. The facility has since installed a pipe around the drain to prevent further releases from entering the sewer line.

**Observations:**

The unit was not in operation during the VSI. PRC noted no evidence of release (see Photograph No. 6).

**SWMU 5****Refuse Dumpster****Unit Description:**

This unit consists of an 8-cubic-yard covered metal dumpster located west of the manufacturing building in the miscellaneous equipment storage area. General refuse, including nonhazardous waste paint filters, is accumulated in this unit.

**Date of Startup:**

This unit began operation in 1983.

**Date of Closure:**

This unit is active.

**Wastes Managed:**

This unit manages nonhazardous waste paint filters and general refuse.

**Release Controls:**

This unit has no secondary containment. Nonhazardous general refuse and nonhazardous waste paint filters are accumulated in a steel dumpster.

**History of  
Documented Releases:**

No releases from this unit have been documented.

**Observations:**

During the VSI, the unit contained about 2 cubic yards of general refuse, including waste paint filters. PRC noted no evidence of release (see Photograph No. 7).

#### 4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and no AOCs at the Hasco facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

### **SWMU 1                      Former Electroplating Solution Treatment Area**

**Conclusions:**                      This unit does not pose a significant potential for release to the environment. The potential for release to environmental media is summarized below.

Hazardous waste was managed indoors at the Former Electroplating Solution Treatment Area. EPA approved closure of this unit on May 18, 1983, and it is currently not used to manage waste. Additionally, no releases from this unit have been documented. Therefore, there is a low potential for release to all environmental media.

**Recommendations:**              PRC recommends no further action for this unit at this time.

### **SWMU 2                      Former Container Storage Area**

**Conclusions:**                      This unit does not pose a significant potential for release to the environment. The potential for release to environmental media is summarized below.

Hazardous waste was managed in 55-gallon drums on a covered concrete surface at the Former Container Storage Area. EPA approved closure of this unit on May 18, 1983, and it is currently not used to manage waste.

RELEASED  
DATE 3-2-99  
RIN # 639-99  
INITIALS WV

ENFORCEMENT  
CONFIDENTIAL

Additionally, no releases from this unit have been documented. Therefore, there is a low potential for release to all environmental media.

Recommendations: PRC recommends no further action for this unit at this time.

**SWMU 3                      Chemical Storage Area**

Conclusions: This unit does not pose a significant potential for release to the environment. The potential for release to environmental media is summarized below.

Hazardous waste is managed in covered 55-gallon drums on a concrete surface at the Chemical Storage Area. No releases from this unit have been documented. During the VSI, PRC observed an oil-stained area covered with absorbent material at the south end of this unit. It is unlikely that a release would leave the enclosed area. Therefore, there is a low potential for release to all environmental media.

Recommendations: PRC recommends no further action for this unit at this time.

**SWMU 4                      Vapor Degreaser Area**

Conclusions: This unit does not pose a significant potential for release to the environment. The potential for release to environmental media is summarized below.

The unit is located indoors above a concrete surface. VOC-containing waste is managed in a completely enclosed system at the Vapor Degreaser Area. Secondary containment at this unit would prevent releases to environmental media. No releases to the environment from this unit have been documented; however, in 1990, 1 gallon of 1,1,1-TCA was released to the sewer. The facility has since installed a pipe around the drain to prevent further releases from entering the sewer line. Therefore, there is a low potential for release to all environmental media.

RELEASED

DATE

RIN #

INITIALS

3-2-99

639-99

mw

ENFORCEMENT  
CONFIDENTIAL

Recommendations: PRC recommends no further action for this unit at this time.

**SWMU 5 Refuse Dumpster**

Conclusions: This unit does not pose a significant potential for release to the environment. The potential for release to environmental media is summarized below.

The Refuse Dumpster manages general refuse, including waste paint filters. Hasco considers waste paint filters to be nonhazardous; however, the facility was unable to provide analysis showing waste paint filters to be nonhazardous. These materials are solid and would be unlikely to migrate from this unit. This unit does not manage VOC-containing waste. No releases from this unit have been documented. Therefore, there is a low potential for release to all environmental media.

Recommendations: PRC recommends that the waste paint filters currently managed in the Refuse Dumpster be characterized to determine if they contain hazardous constituents. Analytical results should be submitted to OEPA and the waste paint filters should be managed accordingly and properly disposed of.

RELEASED  
DATE 3-2-99  
RIN # 0239-94  
INITIALS mv

ENFORCEMENT  
CONFIDENTIAL

TABLE 3  
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Electroplating Solution Treatment Area	1967 to 1983	None	PRC recommends no further action at this time.
2. Former Container Storage Area	1967 to 1983	None	PRC recommends no further action at this time.
3. Chemical Storage Area	1983 to Present	PRC observed an oil-stained area covered with absorbent material at the south end of this unit.	PRC recommends no further action at this time.
4. Vapor Degreaser Area	1983 to Present	In 1990, 1 gallon of 1,1,1-TCA was released to the sewer.	PRC recommends no further action at this time.
5. Refuse Dumpster	1983 to Present	None	The waste paint filters managed in this unit should be characterized to determine if they contain hazardous constituents. Analytical results should be submitted to OEPA for review and the waste paint filters should be managed accordingly and properly disposed of.

## REFERENCES

- Federal Emergency Management Agency (FEMA), 1979. Flood Insurance Rate Map, Village of Jefferson, Ohio, August 1.
- Hasco Spring Industries, Inc. (Hasco), 1992. General Floor Plan (Figure 2).
- Namco Controls Corporation (Namco), 1980a. Notification of Hazardous Waste Activity, July 28.
- Namco, 1980b. RCRA Part A Permit Application, November 11.
- Namco, 1982. Closure Plans for Namco Controls, March 22.
- Namco, 1983a. Letter from Frank J. Napoli to Elizabeth Utley, U.S. Environmental Protection Agency (EPA), February 11.
- Namco, 1983b. Letter from L.E. Ward, Namco, to Elizabeth Utley, EPA, April 22.
- Ohio Environmental Protection Agency (OEPA), 1990. Letter from Christine McPhee to Damon Kaufman, Parmco-Ohio, October 10.
- Parmco-Ohio, 1989. Notification of Hazardous Waste Activity, August 3.
- U.S. Department of Agriculture (USDA), 1973. Soil Survey of Ashtabula County, Ohio, May.
- U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States, Mean Annual Lake Evaporation.
- U.S. Environmental Protection Agency (EPA), 1982. Letter from Karl J. Klepitsch to Frank Napoli, Namco, May 4.
- U.S. Geological survey (USGS), 1960. Jefferson Quadrangle, Jefferson, Ohio (Figure 1).
- EPA, 1982. Letter from Basil G. Constantelos to Frank J. Napoli, Namco, June 15.
- EPA, 1983. Letter from Basil G. Constantelos to L.E. Ward, Namco, May 18.
- Woodward-Clyde Consultants (WCC), 1986. Hydrogeologic Assessment of Ashtabula County, March 28.

**ATTACHMENT A**  
**EPA PRELIMINARY ASSESSMENT FORM 2070-12**



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH 02 SITE NUMBER OHD 004 172 276

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Hasco Spring Industries, Inc.	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 149 Cucumber Street				
03 CITY Jefferson	04 STATE OH	05 ZIP CODE 44047	06 COUNTY Ashtabula	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 41°44'00" N		LONGITUDE 80°46'00" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Interstate 90 east; exit County Route 45 south; turn left on County Route 307 to County Route 46; turn right to Jefferson Street; turn left to Cucumber Street; turn right to 149 Cucumber Street.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Hasco Industries	02 STREET (Business, mailing, residential) 10600 Gratiot				
03 CITY Detroit	04 STATE MI	05 ZIP CODE 48213	06 TELEPHONE NUMBER (313) 925-9400		
07 OPERATOR (if known and different from owner) Hasco Spring Industries, Inc.	08 STREET (Business, mailing, residential) 149 Cucumber Street				
09 CITY Jefferson	10 STATE OH	11 ZIP CODE 44047	12 TELEPHONE NUMBER (216) 576-3040		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency Name) <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> G. UNKNOWN					

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)  
☒ A. RCRA 3010 DATE RECEIVED: 07/28/80 MONTH DAY YEAR    ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / /    ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES    DATE _____ <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1987   Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED  
The substances present are primarily paint; paint thinner; and 1,1,1-TCA product; also present are waste paint thinner; spent 1,1,1-TCA; waste 1,1,1-TCA still bottoms; nonhazardous waste oil; nonhazardous waste antifreeze; nonhazardous waste paint filters; and nonhazardous general refuse.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION  
EPA approved closure of the Former Electroplating Solution Treatment Area (SWMU 1) and the Former Container Storage Area (SWMU 2) on May 18, 1983. No releases from facility SWMUs to ground water, surface water, air, and on-site soils have been documented. In October, 1990, 1 gallon of 1,1,1-TCA was released from the Vapor Degreaser Area (SWMU 4). The release entered the Jefferson wastewater treatment plant. Corrective measures have been taken to prevent further releases. The potential for release to all environmental media is low.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)  
☐ A. HIGH (Inspection required promptly)    ☐ B. MEDIUM (Inspection required)    ☐ C. LOW (Inspect on time-available basis)    ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA			03 TELEPHONE NUMBER (312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT Peter Lynch	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (312) 856-8700	08 DATE 01/28/93 MONTH DAY YEAR

**ATTACHMENT B**  
**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**

## VISUAL SITE INSPECTION SUMMARY

Hasco Spring Industries, Inc.

149 Cucumber Street

Jefferson, Ohio 44047

OHD 004 172 276

**Date:** 12/07/92

**Primary Facility Representative:** Brian Cronan, Product Engineer  
**Representative Telephone No.:** (313) 925-9400  
**Additional Facility Representatives:** David R. Seitz, Executive Vice President-Operations  
Susan Hedman, Attorney - Howard and Howard Attorneys

**Namco Controls (Namco)**  
**Representative:** Robert M. Jaeckin, Controller  
**Acme-Cleveland Corporation (Acme)**  
**Representative:** Donna M. Flammang, Vice President, Secretary

**Inspection Team:** Peter Lynch, PRC Environmental Management, Inc. (PRC)  
Jack Brunner, PRC

**Photographer:** Jack Brunner, PRC

**Weather Conditions:** Cloudy, calm winds, light snow, 2 inches of snow accumulation, 25 °F

**Summary of Activities:** The visual site inspection (VSI) began at 10:45 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Namco and Acme representatives stated that they were unable to provide PRC with information concerning past operations at the facility and left during the introductory meeting. Facility representatives provided the inspection team with a floor plan of the Hasco facility.

The VSI tour began at 11:45 a.m. PRC toured manufacturing areas and visited the Chemical Storage Area (SWMU 3). PRC then visited the Former Container Storage Area (SWMU 2) and the Refuse Dumpster (SWMU 5). PRC then visited the Former Electroplating Solution Treatment Area (SWMU 1) and the Vapor Degreaser Area (SWMU 4).

The tour concluded at 12:35 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 12:50 p.m.



Photograph No. 1

Location: SWMU 1

Orientation: North

Date: 12/07/92

Description: The white concrete strip on the left side of the floor is one of two concrete-filled trenches in the Former Electroplating Solution Treatment Area (SWMU 1). The second concrete trench is located about 15 feet east of this trench, to the right, and is not visible in this photograph.



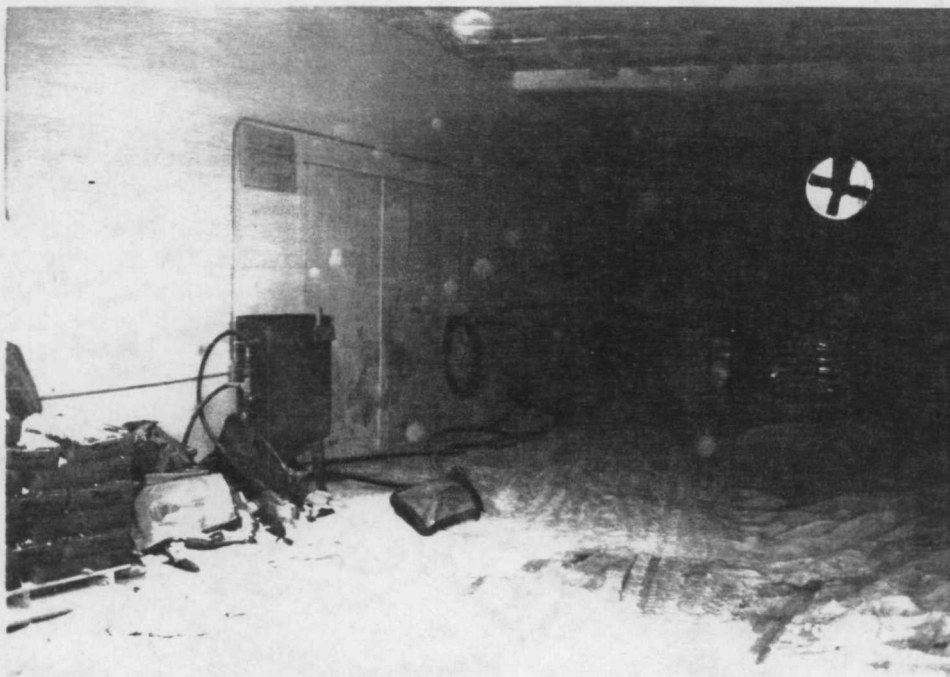
Photograph No. 2

Location: SWMU 1

Orientation: Northwest

Date: 12/07/92

Description: White concrete areas in the center of the photograph mark the location of the two concrete-filled below-grade concrete tanks in the Former Electroplating Solution Treatment Area (SWMU 1). The two 55-gallon drums in the center and to the left of the photograph accumulate nonhazardous general refuse.



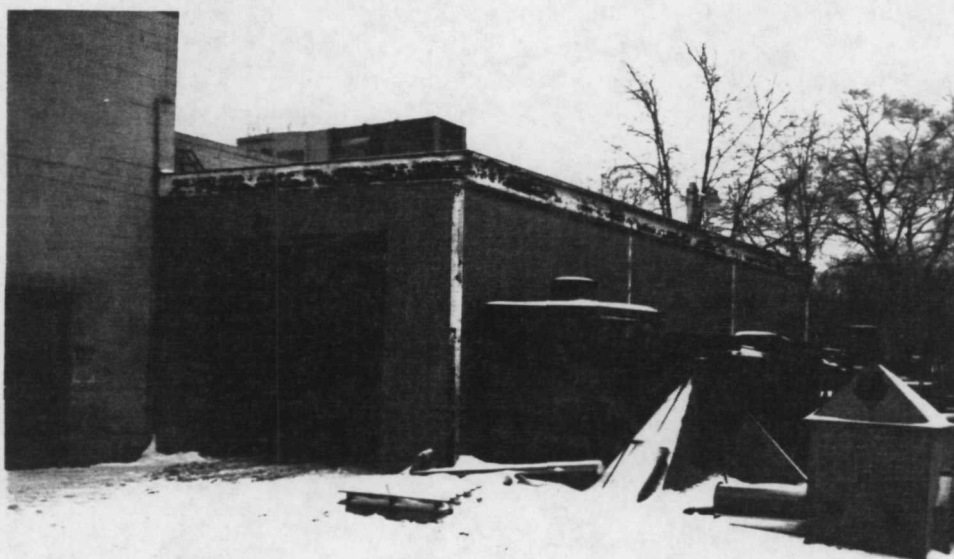
Photograph No. 3

Orientation: South

Location: SWMU 2

Date: 12/07/92

Description: This photograph shows the location of the Former Container Storage Area (SWMU 2). This unit is currently used for sandblasting operations. Fine-grained material on the unit's floor is sandblasting grit.



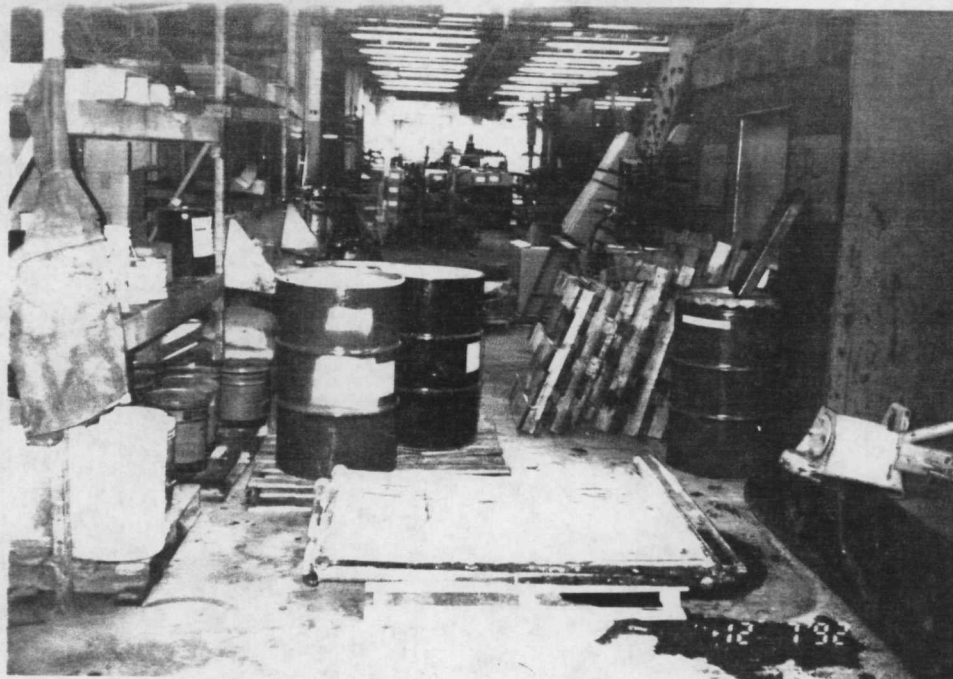
Photograph No. 4

Orientation: South

Location: SWMU 2

Date: 12/07/92

Description: The enclosed area is the Former Container Storage Area (SWMU 2). Material on the right side of photograph is miscellaneous unused equipment.



Photograph No. 5

Location: SWMU 3

Orientation: North

Date: 12/07/92

Description: This photograph shows the Chemical Storage Area (SWMU 3). Two 55-gallon drums in center of photograph contain waste 1,1,1-TCA still bottoms; the 55-gallon drum in right foreground contains nonhazardous waste oil; the 55-gallon drum in right background contains nonhazardous waste antifreeze. Note the oil stains and absorbent material in the lower right of the photograph.



Photograph No. 6

Location: SWMU 4

Orientation: Northeast

Date: 12/07/92

Description: This photograph shows the Vapor Degreaser Area (SWMU 4). A vapor degreasing unit is located on top of the metal grating. A 15-foot by 8-foot by 3-foot concrete pit lies underneath. A distillation unit is located to the left on a concrete floor.



Photograph No. 7

Orientation: West

Location: SWMU 5

Date: 12/07/92

Description: The dumpster shown in the foreground is the Refuse Dumpster (SWMU 5); the 55-gallon drum in the background contains 1,1,1-TCA product.

**ATTACHMENT C**  
**VISUAL SITE INSPECTION FIELD NOTES**

12-1-92

0930

FARMCO-  
ORD

OHIO PA/USI

December Sunday, 28<sup>th</sup>

met Susan Hedman  
+ Brian Cronan -  
explained purpose  
of visit

Facility sold by  
Namco in early 1980s.

lack info for contact re:  
waste mgmt practices.  
Namco representatives.

050

Peter [signature] 12/7/92

Brian Cronan

Calibration, tool  
room, maintenance

vehicle maintenance

- oil, antifreeze.

- Safety Klean-Etne, PA.

- Parts washer

- Paint Booth / Thinner

- Vapor degreaser -  
cleaner, benz  
+ ester

- Fany-Slide Parts  
machine - Fany machine  
wire formed, shipped  
- extensions / [signature]

Compression springs  
Peter [signature] 12/7/92

tool & dye room,  
vehicle maintenance

74,000 square feet.

(Nanco said they'll  
be glad to provide  
info when they  
look at their files.)

\* Acreage

Scrap metal.

Safe mfg.

20-24 avg employees  
1 shift / 5 days a week

Peterbuch 12/7/92

electronic security  
for building only.

Products

- Form-roll
- clamps, mostly  
automotive.

Paints Products

- 5 gallon buckets

Oil-55-gallon drums

Neighbors

- West - Stone containers
- South - Quick Plastics
- North - Residential
- East - Jefferson Manufacturing

Peterbuch 12/7/92

Pamco said no  
OST on property  
since they've owned  
it.

→ Pamco said Namco  
said ~~PLD~~ had plating  
operation wash water

Paint Thinner waste  
- accumulated in  
paint room

Paint washer in  
vehicle maintenance  
area.

Raw material chemical  
storage in west end  
later March 12/7/92

of building

→ waste oils - kept  
in chemical storage  
area.

waste antifreeze  
Chemical storage  
area.

→ Jack ash re: releases  
- spill at vapor  
degreaser - west  
side of building -  
- one gallon.

- Oct. 1990

- entered sewer line  
- since then, put a  
pipe over drain  
later March 12/7/92

already in building when Parsons purchased facility

Pit - used for spill containment.

- discharges into water line.
- Jefferson wastewater.
- city water. no permit. (non-contact cooling).

waiting for air permit

Sand blasting ~~with~~ and paint line.

→ Sand blasting.

- haven't hauled yet.
- piled up on floor.
- sand in recess.

Piller March 12/7/92

\* Paint filters.

- disposed with general trash
- dumpster
- facility doesn't aware of analysis done on paint filters

water

- city water

Swaps used

Safety Klean

- since mid 80's

\* Pro requires dates of operations of

Swaps

Piller March 12/7/92

PRC discusses Part A  
w/ Panco.

- - meat room area  
- near old playing  
area.

- - Drive storage -  
@ Sand Blaster

- - Mench - farmer  
brought <sup>12</sup> through  
PRC said they must  
see area.

- - Two Tanks.  
- playing area pits  
(tanks) filled up  
(built area out)

Current ownership  
Peter Much 12/7/92

since Aug 92.

- Masco - Spring Industries  
- current name.

145 Tour begins

- Tool + Dye  
- Parts for machines  
are here.

- Stamping  
Fan - slide  
- inner made into  
spring.

PRC water minor  
drips of oil

Peter Much 12/7/92

## Chemical Storage

- west end of ~~with~~ <sup>P12</sup> vertical maintenance
- Vapor Degreaser
- waste - TCA, 55-gal drum.
- motor oil
- waste Antifreeze
- Also ~~acc~~ <sup>P11</sup> store oil, antifreeze + paint products.
- some oil dry on bench end.

Photo 1, N, 1153

- Chemical Storage Area.
- no secondary cont.
- TCA, oily antifreeze

Peter March 12/7/92

waste.

- oil spill cleanup in logs.

Photo 2, NE, 1155

- antifreeze + waste oil accumulation

Paint Drying area just east of Chemical Storage

Paint Area.

- Paint Thinner is managed by Safety Klean.
- recycled until pickup (re-used in logs) <sup>100%</sup>

Peter March 12/7/92

System

Photo 3, E, 1158

- Paint Thinner
- recuse machine
- 2-5 gallon buckets
- no cracks, no drain

Sand Blast Area.

- cement pad already here when Pumps bought it.
- Pumps added 3 walls. Roof added here

Photo 4, S, 1201.

Sand Blast Area

- Pumps Drum Storage from Paul A.

Photo 5, S, 1203  
Peter March 12/7/92

photo 61  
W, 1207

Sand Blast Area

not fenced at property boundary

- Caged area has one drum of TCA product on a pallet
- used here for vapor venting
  - concrete

Flash Dimpster 8-d 3

- Paint Filter disposed
- Wash-Eater disposed
- and more since '82/83

Fabrication.

- Dates of equipment  
Peter March 12/7/92

in seg. for inhouse  
use mostly.

30' x 15'  
relax @  
staples  
spring up  
24 up, 18 up  
Treatment Room  
lulled in with  
concrete - lower  
area (3 feet below  
plant floor) on  
north side of  
building.

- benches
- immediately  
south of plating  
treatment room.
- sloped (6" → 18"  
at north).

Door on north,  
concrete pad just  
outside.

Peter Koch 12/7/92

large crack between  
benches + ~~water~~<sup>(1)</sup>  
treatment room ~~room~~<sup>(1)</sup>  
area 1 1/2 inch  
wide (floor offset)

Photo 6, N, 1217  
treatment room  
- extension / compression  
springs in lagging  
- while concrete  
in old treatment  
Room.

Photo 7, N, 1219  
- old trench in  
plating area.  
- 1' x 25' x 6-8"  
- 15' pad in  
Peter Koch 12/7/92

similar trench  
1.5' x 25'

Graphite grease  
hydraulic press  
system - bag lined  
Drum + bag returned  
to supplier

Vapor Degreaser Pit

- still system
- drum brought  
over when still  
bottoms need to  
be scooped out

Pit 15' x 8'

- still in a sumo  
degreaser + still
- still bottoms

Peter Ruck 12/7/92

go to Chemical  
Storage Area.

Pit serves as  
a secondary containment  
- pit already here.

- Put in by Hanco.
- Pit is covered  
by a grate (P) grate.

Photo 8, NE, 1227

- Vapor Degreaser Area
- unit @ left is  
still.
- unit at right, over  
grate, is vapor  
degreaser.
- grate over 8' x 15'  
concrete pit.

Peter Ruck 12/6/92

90

Shipping, Receiving  
Dock

1230

Tom ends

assemble in conference  
room. PRC reviews list  
of old I information.

1240

PRC leaves facility  
on way out, PRC photos  
outside of former Ritzing  
Area.

Photo 9, S, 1242

outdoor area north  
of former treatment  
area

Rita L. 12/7/92

(52)

12/7/92

Paraco &amp; Hasco Spig Distributors

PAUSE (Formerly Nance)  
Paraco 1

10:45

Paraco - s.t. cloudy, light snow; ~25°F

John Banner

Peter Lynch

Melville - Brian Conner

- Susan Helman

- David Seitz

- Donna Flammang

- Robert Jacobson

Fabrication / Tool Room / Maintenance

- Vehicle Maint.

- Oil / Anti-Air.

- Safety - Klein

12/12/92

(53)

- Parts washing solvent

- Paint Primer w/str.

- vapor degreaser (Benz. titl.)

- 4-sldr. machine (?) - coats forming machine

- Tool dye room

- vehicle maintenance

- Manufacturer w/ll s.t.s

- 74,000 ft<sup>2</sup> - building, metal fabricates

- 20-28 employees (shift 5 days/week)

- Scrap Metal

- Electronic security for building only

- Back yard is fenced

- Primarily automotive parts are worked -  
(ie. muffler plants)

12/12/92

⑤

- paint - 55-gallon buckets
- oil - 55-gallon drums

- West Str. Contain

10 US - Pink Phyllos. across Ery 'St. ='

M - 1	Residual	100	100	100
-------	----------	-----	-----	-----

[illegible][illegible]

-	16	US	@	the	city	5	4	01	15	-
---	----	----	---	-----	------	---	---	----	----	---

- West point River  $\rightarrow$  Paint room

- Parts washer - maint. area

Chemical storage area - non hazardous only (12)

*water oils*

S.K. of Eric, Pennsylvania

- 3.11.11 vaper d'igrazzer -- u gellan

inside	Oct 1990	→ same lines
--------	----------	--------------

3/1/62



- pipe inside a containment pit and  
install to prevent further releases

- Separat. Sanitng:	sewer
- 11	- 11

discharge & Jefferson WWT

~~Don't die, please~~ (1)

No contact cooling  $\text{HeO}$  discharge daily

- Applied to our parents for surgery!  
parent 'law' -- no response from OPA  
yet.

- Sandblasting sand has not yet been shipped  
off site -- collect in pits  
! reused

- Pant. Altus  $\rightarrow$  gravel trash dumpster

- no evidence of analysis

City H<sub>2</sub>O @ the facility source unknown

1801/92

②

- Begin operations in 1977  
 always been used - Chemical Storage  
 Room for waste storage

- "Pit" b. digman was here before  
 Franco

- from shown in upper left of photo at  
 Port A. is apparently the waste  
 sand blasting area, which has been  
 enclosed

- Current ownership - August 1982 -  
 Hesco Spring Industries, Inc.

11:45 - Begin Activity here

Tool: Dye Room

11/13/82  
 13

③

"Chemical Storage Area" - @ west end of  
 facility

2 drums - waste TCA  
 on drum used oil  
 on drum used antifreeze

otherwise - scrap materials: new  
 materials stored in this area  
 - (oil, antifreeze, paint, etc.)

11:55 Photo #1 North - Chemical Storage Area  
 Photo #2 Northwest " " " "  
 (shows used oil &  
 antifreeze)

- Nothing drawn in area  
 - CSR is just west of paint drying area

- Paint thinner is used in S.K. pit  
 washing type of unit - removed until paint  
 11/13/82 13

Plat #3 panel inner wall - East

- @ S. & L. blast area - old root still in place (also concrete pad)
- added 3 walls & door
- concrete floor

Plat #4 S. S. & L. blast area

Plat #5 - " " " (to the back)

- Drain cage w/ concrete floor - present TGA drawn site

- General Trash - Northwestern Disposal

Plat #6 - Drain cage & dumpster W

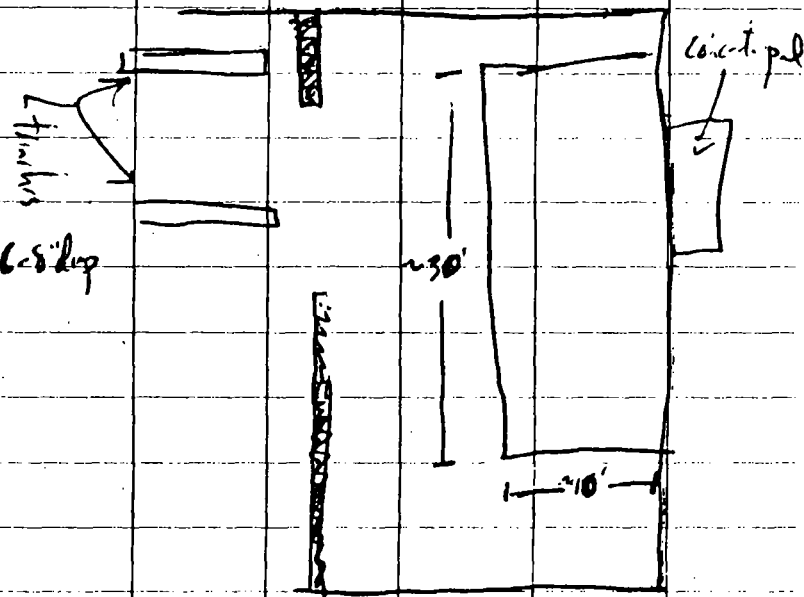
- Dumpster haul one/week

- Some platting area @ North end of building

5/22/12

- Concrete pits: collection tanks at the platting area have been filled w/ concrete.

- Concrete pad just outside drain platting area - tanks possibly located here



Plat #7 NW - shows former pit location (white area on floor)

Plat #8 N - Trench in floor filled w/ concrete (white area on floor)  
5/22/12

- a second trench was built ~ 15' East of the trench

Trenches ~ 1' x 30' x 6-8"

- Vapor degreaser w/ still

- Degreaser is above concrete

pit ~ 8' x 15' x ~ 3' deep

- Still bottoms -> down in Chamber  
Storage Room

- Pit was on site during prior operations  
now used for 2<sup>nd</sup> containment only

- Photo # 19 NE. Degreaser: still

- still is green; blue unit to the

1.4 ft from photo

DB 12/7/12

12:35 Finish safety tour / wrap-up meeting

- Ptoch. requests further information

- report generator status

- detailed operation for potential SKMMS

- drawing showing property boundaries

12:45 Finish vapor degreasing

- Detention outside of treatment area

- Photo # 10 South - report area  
outside tanks

12:50 PRC at site

DB  
12/7/12